

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

REED INTERNATIONAL INC.

Plaintiff,

-against-

AFGHANISTAN INTERNATIONAL BANK,

Defendant.

MEMO ENDORSED

Civil Case No.: 1:21-CV-10626-ER

NOTICE OF MOTION


PLEASE TAKE NOTICE that upon Defendant's Memorandum of Law in Support of its Motion to Dismiss the Complaint, dated March 4, 2022; the Declaration of Joseph Carasso in Support of Defendant's Motion to Dismiss the Complaint, dated March 4, 2022, and all exhibits attached thereto; and upon all the papers and proceedings had herein, Defendant Afghanistan International Bank will move this Court, before the Honorable Edgardo Ramos, United States District Judge for the Southern District of New York, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York, on a date and time to be designated by the Court, for an Order dismissing the Plaintiff's Complaint (a copy of which is annexed hereto as Exhibit A) pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(3), and the doctrine of *forum non conveniens*.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Rule 6.1 of the Local Rules of the United States District Court for the Southern District of New York, Plaintiff's papers in opposition, if any, must be filed by March 18, 2022, and Defendant's papers in reply, if any, must be filed by March 25, 2022.

Dated: New York, New York
March 4, 2022

Defendant Afghanistan International Bank's motion to dismiss, Doc. 13, is denied without prejudice. Defendant is directed to file a letter requesting a pre-motion conference in connection with its motion to dismiss pursuant to the Court's Individual Practices.

The application is ☐ granted
☒ denied



Edgardo Ramos, U.S.D.J.
Dated: 3/6/2022
New York, New York

DUANE MORRIS LLP

By: /s/ Christopher W. Healy

Christopher W. Healy

C. Neil Gray

Spencer D. Wein

1540 Broadway

New York, New York 10036

(212) 692-1000

(212) 692-1020 (facsimile)

cwhealy@duanemorris.com

cngray@duanemorris.com

sdwein@duanemorris.com

Attorneys for Defendants